

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
1998 Biennial Regulatory Review—)	
Streamlined Contributor Reporting)	
Requirements Associated with Administration)	CC Docket No. 98-171
Of Telecommunications Relay Services, North)	
American Numbering Plan, Local Number)	
Portability, and Universal Service Support)	
Mechanisms)	

COMMENTS OF AMERITECH

I. INTRODUCTION AND SUMMARY

Ameritech¹ submits these comments in response to the Commission's Notice of Proposed Rulemaking and Notice of Inquiry² to improve the data collection process for four different filing and reporting requirements as part of the Commission's 1998 Biennial Review of its regulations pursuant to section 11 of the Telecommunications Act of 1996 ("the Act")³. The requirements are for the Telecommunications Relay Services (TRS) fund, federal Universal Service support mechanisms (USF), North American Numbering Plan (NANP) cost recovery administration and long-term local number portability (LNP) cost recovery administration.⁴

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¹ Ameritech means: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company and Wisconsin Bell, Inc.

² See Notice of Proposed Rulemaking ("NPRM") and Notice of Inquiry ("NOI") in this proceeding released September 25, 1998.

³ See 47 U.S.C. § 161

⁴ See NPRM at para. 1.

Ameritech supports the proposal to consolidate the current reporting requirements into a new Telecommunications Reporting Worksheet (the “Worksheet”), and recommends only limited changes. Current filing requirements impose unnecessary burdens that should be reduced by combining these reports. Ameritech also supports the proposals for applying end user revenue for the NANPA and TRS calculations, sharing of data among administrators, delegating management of the Worksheet to the Common Carrier Bureau, and using an electronic filing process.

II. A UNIFIED TELECOMMUNICATIONS REPORTING WORKSHEET SHOULD BE ADOPTED

Ameritech supports the tentative conclusion of the NPRM to consolidate the reporting requirements for TRS, USF, NANP, and LNP on a unified worksheet⁵. The Worksheet could also be used to fulfill reporting requirements for agent for service of process under section 413 of the Act and for revenue and plant data currently required under section 43.21(c) of the Commission’s Rules. Consistent with the intent of section 11 of the Act, this consolidation will decrease the administrative reporting burden on carriers, lessen the chance for errors and inconsistencies, and streamline the current reporting process.

Simplified and consistent reporting will also be achieved by use of end user revenue as the funding basis for NANPA and TRS funding, an April 1 unified filing date, first day of each month payment schedules, and electronic filings⁶.

Ameritech also supports the delegation of responsibility for future Worksheet changes to the Chief of the Common Carrier Bureau,⁷ in the interest of eliminating

⁵ See *id.* at paras. 16-18.

⁶ See *id.* at paras. 26, 32-47, 28, 30 and 60-62, respectively.

⁷ See *id.* at para. 55

protracted rulemaking proceedings to achieve further streamlining. The Bureau should continue to refine the Worksheet to remove detailed line items that are unnecessary for fund calculations.

It is also appropriate to allow the sharing of certain information between fund administrators,⁸ so long as such sharing does not result in exposing carriers' proprietary information to additional disclosure risk under the Freedom of Information Act. Such sharing appropriately achieves administrative efficiencies.

Ameritech proposes the following limited revisions to the Worksheet:

- Lines 203-214 (Revenue from Service Provided to Resellers) should be eliminated since it is not “end-user” telecommunications revenue.
- Given that Line 230 (contribution base) is defined as the sum of lines 215 through 223 plus lines 225 through 229, it is necessary to eliminate line 224 (international calls that both originate and terminate in foreign points), since it is not used in the calculation. Lines 231 (enhanced services, etc.) and 232 (gross billed revenue from all sources) should be eliminated for the same reason.
- Lines 215 through 230 (except line 224 which should be eliminated) should be consolidated into four lines:
 - Surcharges or other amounts (line 215)
 - Fixed local service (lines 216 through 220)
 - Mobile service (lines 221 through 222)
 - Toll service (lines 223 through 229)

⁸ See *id.* at paras. 56-59.

III. THE BILLING AND COLLECTION FUNCTIONS SHOULD BE CONSOLIDATED WITH A SINGLE AGENT

Ameritech tentatively supports the proposals in the NOI to consolidate all of the billing and collection functions for the reports with a single agent.⁹ This should increase the efficiencies of the contribution process and lead to greater accountability for both the industry participants and the Commission. Before adopting these proposals, however, the Commission should complete a cost/benefit analysis to verify that this consolidation will reduce total administrative cost and produce other assumed efficiencies.

IV. CONCLUSION

Ameritech supports consolidation of the current reporting process for TRS, USF, NANP and LNP administration into a unified worksheet, with a cost effective billing and collection mechanism. The NPRM and NOI are positive steps in achieving the streamlining of regulatory requirements contemplated by Congress in establishing the requirement of the Biennial Review under section 11 of the Act.

Respectfully submitted,

A handwritten signature in cursive script that reads "Leander R. Valent". To the right of the signature is a circular stamp containing the letters "AT".

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Dated: October 30, 1998

⁹ See *id.* at para. 63.